

From: [Brandon Bogle](#)
To: [Josh Harris](#)
Subject: FW: Huntington & Cabell County - Requests for McKesson Depositions - Meunier & Oriente
Date: Wednesday, August 12, 2020 2:01:27 PM

From: Rice, Dale <drice@cov.com>
Sent: Friday, July 24, 2020 9:18 AM
To: Brandon Bogle <bbogle@levinlaw.com>
Cc: MCKDefensiveDisco <MCKDefensiveDisco@cov.com>
Subject: Huntington & Cabell County - Requests for McKesson Depositions - Meunier & Oriente

CAUTION: This email message is **EXTERNAL**.

Brandon,

Kevin Meunier is available for his four-hour deposition on September 10, 2020. Because this deposition was requested some time ago, and has been delayed because Mr. Meunier is an essential worker dealing with Covid-19 supply line issues, McKesson will stipulate to having this deposition go forward after July 27, 2020 and will not seek to limit use of the deposition because it is going forward after the close of fact discovery.

With regard to Michael Oriente, your July 22, 2020 email is the first time that Plaintiffs requested Mr. Oriente's deposition in the City of Huntington and Cabell County Commission actions. McKesson does not believe this request, made just five days before the deadline set by the Court to complete fact witness depositions, is timely or appropriate. Moreover, as you know, Mr. Oriente was deposed in the MDL, deposed in the Ohio Attorney General action, and interviewed by the New York Attorney General. Plaintiffs have all of those transcripts. McKesson is not going to agree to make Mr. Oriente available for a fourth time in these actions in response to an untimely request made only five days before the close of fact discovery.

Best regards,

Dale

Dale A. Rice

Covington & Burling LLP
Salesforce Tower, 415 Mission Street
San Francisco, CA 94105-2533
T +1 415 591 7081 | drice@cov.com
www.cov.com

This message is from a law firm and may contain information that is confidential or legally privileged. If you are not the intended recipient, please immediately advise the sender by reply e-mail that this message has been inadvertently transmitted to you and delete this e-mail from your system. Thank you for your cooperation.

